

June 14, 2007

Mr. Howard G. Bergstrom
Director
Business Operations Center
Office of the Chief Financial Officer
U.S Department of Energy
Mail stop CF-60, Room 4A-221
1000 Independence Avenue SW
Washington, D.C. 20585

Re: RIN1901-AB21 Loan guarantee for projects that employ Innovative Technologies

Dear Howard.

The proposed Rulemaking is very well done. We believe we can operate under the regulation as written. We also believe that there should be a definition of a technology as it applies to an industry such as power plants, refineries, and oil and gas production because the fuels and processes may be different for each industry.

Our technology is an oxy-fuel technology that can be applied to coal, pet coke, and residuum. The burner design is different for each fuel. The processes in a power plant are sufficiently different from a refinery and while you may use the same burner design for a particular fuel, the rest of the processes are assembled in a different order sufficient to be the first of a kind for that industry.

We do not have an objection to amount of guarantees allowed (say 5) but we think that it should be applied to an industry and to a fuel By expanding the definition of technology and have it apply to an industry and fuel it would accommodate a suite of technologies.

We are looking forward to working with you.

Yours truly,



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